

Response on UKPI ‘guiding principles’

1. Introduction

- 1.1 The Russell Group is grateful for the opportunity to comment on the new guiding principles for the UKPIs.
- 1.2 Recommendation 4 for the future of UKPIs, states that: the key features of the current UKPI approach should be retained. A set of guiding principles should be developed and used by the UKPISG to judge the appropriateness both of making changes to the existing UKPIs and of introducing any new UKPIs suggested for the future.
- 1.3 UKPISG noted (and will stand) by Recommendation 9 in the report which states that: the introduction of any additional UKPIs or amendments to existing UKPIs must involve further dialogue with the sector to ensure buy-in. We welcome this approach in principle, and hope this will lead to some robust revision of the UKPIs where appropriate.

2. Guiding Principles

A: Coverage and scope

A1: UKPIs should normally seek to reflect the totality of higher education (HE) provision and institutions across the UK.

A2: UKPIs should measure what matters, notably underpinning long-term policy goals for the sector and reflecting the core mission of a significant proportion of institutions. In some areas sector-level only measures might be more appropriate than those at institution level.

A3: UKPIs should, as standard, provide an aggregate picture of UK HE and allow institutions to compare themselves to other institutions in the different nations across the UK. In addition there may be a requirement for a small number of nation-specific indicators that reflect differing national contexts.

A4: Taken together, the UKPIs and their associated benchmark values should provide information in the public domain that is not otherwise easily available. There must be a value to a wide range of stakeholders in publishing the UKPI and benchmark values at institutional level.

- 2.1 There are areas where the Russell Group would not concur that the UKPIs reflect the totality of HE provision and institutions across the UK.
- 2.2 The existing PIs provide some useful information which is not available elsewhere about the relative performance of institutions in certain areas.
- 2.3 There are some particular problems with the benchmarking for the **Widening Participation** PIs. These are fundamentally flawed because they fail to provide a full picture of the student body actually qualified to enter many courses. They take no account of the fact, for example, that someone with four A*s at A-level might not have a strong chance of acceptance on a very competitive Medicine course, unless the A-levels are in the required subjects.

- 2.4 The Widening Participation benchmarks do not consider whether able students apply in the first place. Despite all our efforts to encourage applications from disadvantaged students, our universities cannot offer places to those who do not apply.

B: Quality of data

B1: UKPIs should be produced by a credible and independent organisation.

B2: UKPIs should be evidence-based and statistically robust, conforming to recognised best practice in the production of statistical information. Data used for the indicator should be of high quality collected in a consistent and fair way across the sector; they should have a good sample base, use consistent definitions, and use a transparent methodology.

B3: UKPIs should normally have longevity/continuity, enabling a time series to be developed and the ability for users to conduct longitudinal analysis.

B4: UKPIs should be produced in a regular and timely fashion and where possible, be produced annually. However it is acknowledged that it may not be sensible for all new UKPIs to be produced annually, especially where to do so would be costly or put too much of a burden on institutions.

- 2.5 The Russell Group has further concerns about the quality of the data presented as part of the UKPIs. We would like to see improvements in the way in which the UKPIs are correlated and their statistical robustness.

- 2.6 Although the **Widening Participation** benchmarks now take into account the relative quality of entry requirements, they still do not take into account an institution's specific entry requirements.

- 2.7 The robustness of some of the data used to calculate the WP benchmarks and PIs is questionable. For example, data on socio-economic class (SEC) is based on self-reported information from students about their parental occupation.

- 2.8 Consideration should perhaps be given to whether the SEC data in PIs remains sufficiently robust to be used in measuring the performance of individual institutions.

- 2.9 The state school PI is potentially misleading because it fails to take account of the diversity of both the state and independent school sectors.

C: Dissemination

C1: The UKPIs and their associated benchmark values should be free and available to all.

C2: Details of the methodology and benchmarking process used in the production of the UKPIs should be published for the benefit of institutions, bodies acting on behalf of institutions, government bodies and agencies and any other interested parties. No institutional-level results should be published before giving the participating higher education providers an opportunity to correct errors of fact.

C3: Publication of the UKPIs and their associated benchmarks should include appropriate guidance and contextualisation so as to facilitate accurate interpretation of the measures and the outcomes that they seek to represent.

- 2.10 We would agree that the dissemination and interpretation of the UKPIs could be improved.

- 2.11 There are aspects of the UKPIs that are unnecessarily complex, for example the PIs on Non-continuation and Module Completion are difficult to interpret. We would question whether many non-expert users can accurately interpret the data.
- 2.12 Non-continuation is a very important aspect of university performance and consideration could be given to simplifying the measures in this area to make them accessible to a wider audience.

D: Benchmarking and enhancement

D1: UKPIs should be directional and attributional measures. There must be general agreement as to what represents a positive or a negative outcome, and that movement in values can be attributed to changes in sector or institutional activity rather than solely reflecting wider extraneous factors. This enables users to understand the direction of travel of the sector and of individual institutions, and so UKPIs can be used to underpin policy development and evaluation as well as institutional performance enhancement.

D2: There should be an expectation that institutions will take note of their indicators and benchmarks, look carefully at any differences occurring with a view to further exploring areas of weakness in their institutional performance, and ultimately strive to improve.

D3: UKPIs and their associated benchmarks should not be presented in such a way as to imply any institutional ranking. They should provide information for external policy-making stakeholders that is suitable for informing policy, and information for institutions that is suitable for internal use.

D4: The benchmarks provided in association with UKPIs should take account of context and differing institutional characteristics, thereby supporting fair comparison of indicators between institutions.

- 2.13 We are concerned that by taking account of the context and differing institutional characteristics, there is the potential for limiting the use of the UKPIs to only giving a snapshot of an institution's performance against another at a particular moment, rather than showing improvement over time.
- 2.14 For example, the Widening Participation benchmarks are a moving target if institutions with very different challenges meet their benchmarks, then this means the benchmarks for all universities become more challenging. Universities could meet them one year and fail the next with exactly the same intake.
- 2.15 Performance against benchmarks only gives an indication of an institution's performance relative to other institutions, and they do not give a very good indication of an institution's improvement in a particular area over time.
- 2.16 Not all UKPIs align directly with institutional strategy and aims. Institutions are therefore likely to focus institutional performance analysis and improvement efforts on those indicators which align with institutional aims, rather than attempt to improve performance in every possible UKPI category.

E: Burden of data collection

E1: Where possible, existing data sources should be used to develop new UKPIs and/or to improve existing UKPIs. Any proposal to collect further data should be carefully costed through dialogue with the sector or their representatives, and justified in terms of anticipated use and usefulness. The UKPISG should be mindful that the UKPIs should not place undue burden on the sector.

- 2.17 Each year our universities need to make some 550 separate data returns to government or government agencies.¹ Our members would like to see this regulatory burden reviewed, and where feasible, reduced and streamlined.
- 2.18 The existing PIs are somewhat skewed (in terms of the amount of data published) towards performance in the two areas of widening participation and non-continuation. Consideration could be given to whether the overall suite of PIs could in the future present a more balanced picture of overall institutional performance across teaching, research and innovation.
- 2.19 Any future PIs should not require additional data collections from institutions. If possible, the quantity of data collected nationally from institutions should be reduced, in order to ease the costs and administrative burden on institutions, and allow them to redirect resources to their primary activities of teaching, research and innovation.

F: Influence on behaviour

F1: Publishing UKPI and benchmark values at institutional level must not knowingly create perverse incentives or lead to perverse behaviour.

F2: UKPIs should comply with all relevant legislation and evolving best practice, particularly in the areas of statistical disclosure control and support of fair competition between institutions.

- 2.20 The future removal of Student Number Controls in England is likely to lead to greater competition. Greater competition will lead to published metrics having a greater significance. The reputation of individual universities will be judged in part on published data including performance indicators, and this should be considered carefully when collecting and publishing such information. Performance indicators may provide information about the relative performance of UK universities, and they might also be used to draw conclusions about the international competitiveness of UK higher education.
- 2.21 There can be a risk of unintended consequences arising if undue emphasis is placed on individual measures. The body developing and publishing a performance indicator cannot control how it is interpreted by third parties, and in this context it becomes important to consider how the information is likely to be interpreted when developing proposals.

¹ *The HE data and information landscape: a pathway to reform - Report to IRPG*, p. 14

Response on UKPI ‘recommendations’

1. Response to recommendations

Recommendation 1: UKPIs and benchmarks have value and should therefore be retained.

The Russell Group agree that PIs and benchmarks have value, however there needs to be a number of revisions made to the data used for benchmarking – particular those used in relation to Widening Participation.

Recommendation 2: In principle, UKPIs should continue to have UK-wide coverage.

The Russell Group agrees. However, we would like to see the UKPIs covering all institutions, including those alternative providers not funded by HEFCE.

Recommendation 3: UKPIs should continue to focus on UK-wide sector level priorities and provide both sector-level and institutional level measures and benchmarks in these areas.

The Russell Group would agree. Consideration should be given to whether the socio-economic class (SEC) data in PIs remains sufficiently robust to be used in measuring the performance of individual institutions.

Recommendation 4: The key features of the current PI approach should be retained. A set of core principles should be developed (building on those from the 2006 review) to judge the appropriateness of making changes to the existing PIs and introducing any new PIs suggested for the future.

The Russell Group would like to see the development of a more nuanced suite of PIs. The range of PIs can be broadened without adding to the administrative burden if there was less concentration on the existing measures. We are concerned that the range of areas measured by the UK PIs is too narrow to provide a broad enough picture of higher education across an institution. A solution would be a broader range of PIs, without expanding the existing number.

Recommendation 5: The current set of PIs should undergo a more detailed review to ensure they use the most appropriate data and have the appropriate focus to measure the specified topics, including the scope of the population covered.

The Russell Group endorse this position, and support widening the range and breadth of the areas considered by the PIs. There are concerns about the type of measures currently being used as PIs. We would prefer to see a more diverse range of PIs within a limited framework, so that the PI measurement process does not become over burdensome to our member institutions.

Recommendation 6: Within the context of recommendations 2 and 3 above, the feasibility of broadening the coverage of UKPIs into five new areas (mostly beyond teaching and learning) should be explored: i) value-added, ii) financial sustainability, iii) teaching quality, iv) international outlook and v) employer and business engagement.

The Russell Group agrees with this – a fuller picture of the HE sector could be developed if the range of PIs was developed in a more sophisticated way. An expansion in the quantity of PIs for the sector is not desirable; however a more representative sample would be advantageous.

Developing the coverage of broader areas for the PIs to look at is welcome – however the Russell Group want these concentrated on teaching, research and innovation, rather than being spread too thinly across numerous topics.

The use of ‘value-added’ as an area of PI coverage should be resisted. This is primarily because we would query whether or not this could be counted as an objective measure as the Russell Group would have no confidence that this could be accurately measured.

Likewise, teaching quality as a PI measure would not be easy to benchmark, as there is no robust way of quantifying teaching quality.

Recommendation 7: Specific individual institution-level operational indicators that move beyond UK-wide sector level priorities should be developed as necessary through other means, such as the improved functionality of the Higher Education Information Database for Institutions (HEIDI), rather than developed as separate UKPIs. HEIDI is available to all full subscribers to the Higher Education Statistics Agency.

Improvements in the functionality and accessibility of the HEIDI database are welcome. However it would be desirable to see consideration given to whether the overall suite of PIs could be developed to give a balanced overall picture of institutional performance across teaching, research and innovation.

In 2010 HESA recommended that HEIDI be further developed for benchmarking purposes; this would be appropriately guided by the HE user community. (HESA, Benchmarking to improve efficiency, November 2010)

Recommendation 8: Students (prospective and current) should not be considered a direct audience of PIs, and instead the information contained in PIs should be disseminated to students indirectly through mediating bodies.

The reputation of the UK’s universities may be influenced in part by published data including performance indicators, and this should be considered carefully when collecting and publishing such information.

Recommendation 9: The introduction of any additional PIs or amendments to existing PIs must involve further consultation with the sector to ensure buy-in.

Consultation with stakeholders is necessary and essential to the continued development of credible PIs for the sector.

This is an approach that must be applied to ensure that the sector is kept informed of any new developments or proposed changes.

For future consultations on UKPIs it would be helpful to have a longer response period. This is the second consultation on PIs in a year, and could have given institutions and other further time to consider these important proposed changes.

2. Validity of PIs

- 2.1 The literature review in Part 2 of the report states Johnesq(1992) view that once a variable is chosen as a PI, that variable becomes subject to manipulation by the monitored institution and thus loses its reliability.
- 2.2 Research shows that the impact of PIs crucially linked to resource implication (e.g. research funding, student quotas, etc.) Thus it is questionable whether indicators are indeed comparable across institutions, especially considering the variety of HEI types in the UK, the values they represent and the missions they follow.
- 2.3 The Russell Group would agree that PIs should aim to present data in a way that helps universities to assess their performance against quantifiable measures. Any quantitative measure of this kind will have limitations due to the data being used: issues may include data quality, comparability, granularity, and availability.
- 2.4 The above limitations should be recognised, and it may be helpful to supply narrative alongside the numerical PIs to put them in context. The design of PIs should reflect the intended audience.
- 2.5 An over-reliance on data-driven indicators can be an aid to good judgement; however inspection is not enough; interpretation is always necessary.¹
- 2.6 There is further reference to the types of PIs used in other countries . specifically Australia. This refers to the need for PIs to be statistically sound and methodologically rigorousq The Russell Group reiterates the need for the UKPIs to match this standard.
- 2.7 The robustness of some of the data used to calculate the WP benchmarks and PIs does not match the level of quality expected. At the heart of the review, there should be a clear driver toward ensuring that in future PIs are validly assessed and straightforward to source and understand.
- 2.8 Published performance indicators may be used by a whole range of stakeholders including universities, regulatory and funding bodies, students, businesses, schools and colleges, the media, and the general public.

3. Range and breadth of PIs

- 3.1 The range of areas measured by the UKPIs is too narrow to provide a broad enough picture of higher education across an institution. Consideration should be given to whether in future the overall suite of PIs could present a more balanced picture of overall institutional performance across teaching, research and innovation. This could be achieved by the replacement of some of the existing PIs with alternatives, rather than a policy of overall expansion.
- 3.2 Any future PIs should not require additional data collections from institutions. If possible, the quantity of data collected nationally from institutions should be reduced, in order to ease the costs and administrative burden on institutions, and allow them to redirect resources to their primary activities of teaching, research and innovation.
- 3.3 The literature review makes reference to PIs that seek to measure attrition rates, graduation rates or grade distribution as only proxies and generally measure the wrong thing, because they do not take into account the widely differing characteristics

¹ Committee of Vice-Chancellors and Principals/University Grants Committee (1986)

of student bodies. The Russell Group concurs with this assessment, agreeing that the value of PIs lies in comparability year on year.

- 3.4 Insofar as the collection of data for PIs in other countries is concerned, there is a need for an emphasis on keeping the collection and analysis of PIs cost-effective and limiting the administrative burden on respondents. The literature review notes that this is the aspiration set out in Australia, and the Russell Group would like to see a similar tone adopted in the UK.
- 3.5 The Russell Group agree with the QAA Framework principle for collection of data being applied to the collection of UKPIs. That is to say, a lightness of touch, so that the burden on HEIs is reduced to the minimum consistent with proper accountability and meeting information needs, and so that the greatest value is secured from the resources used. Applying this principle to the collection of UKPIs would be a prudent approach to data collection.
- 3.6 The survey of stakeholders also acknowledges that the resources required by institutions to collect process and return the information for PI analysis are significant; and with the current focus on efficiency and driving down costs, there is a strong desire not to collect any further information and/or make additional data returns. This is a point of view that the Russell Group shares.
- 3.7 If PIs are used to ensure that standards and quality experienced at a university go up, then there is a justification for their use to an internal audience of stakeholders. Given the wide range of stakeholders with an interest in higher education, it is important that published information should be robust and relevant, and its limitations should be stated clearly.